

Voice Unfulfilled Service Requirement

The Virgin Islands Telephone Corporation had two unfulfilled service requests at the end of 2016. One order was staged to our Outside Plant Engineering department for evaluation and one order was in the Construction stage.

Over the past few years, our network has undergone an upgrade from a legacy wireline network to an HFC network, which has been essentially completed. However, there still exists certain locations/areas that remain difficult to access for various reasons. When service requests are received for these areas, they require engineering intervention, evaluation, redesign and construction to extend the HFC network to serve these locations.

Broadband Unfulfilled Service Requirement

The Virgin Islands Telephone Corporation had seventy-two unfulfilled service requests at the end of 2016. Fifty-five of these orders were staged to our Outside Plant Engineering department for evaluation and seventeen orders were in the Construction stage.

Over the past few years, our network has undergone an upgrade from a legacy network to an HFC network, allowing us to upgrade our service offering from DSL to high speed broadband. Although the HFC network is essentially complete, there still exists certain locations/areas that remain difficult to access for various reasons. When service requests are received for these areas, they require engineering intervention, evaluation, redesign and construction to extend the HFC network to serve these locations.

Service Quality Standards

The Virgin Islands Telephone Corporation has worked with the VI Public Services Commission to develop service quality standards to monitor the company's performance on a regular basis and through the recent significant infrastructure upgrade. This upgrade has positively impacted its overall service standards and reporting capabilities. The Virgin Islands Telephone Corporation is currently required to report performance based on the following metrics on a monthly basis:

Current Quality of Service Status- Monthly Reports (8 Objectives/Metrics are in bold)

The Virgin Islands Telephone Corporation submits to the PSC quarterly, its monthly performance results which consists of the following metrics:

- Customer Service
 - o Total calls received
 - o Total calls abandoned
 - o Total calls answered
 - o **Percent of calls answered within 20 seconds (Objective: 90%)**
- Repair (912)- Call Volume
 - o Total calls received
 - o Total calls abandoned
 - o Total calls answered
 - o **Percent of calls answered within 20 seconds (Objective: 90%)**
- Directory Assistance (913)
 - o **Average Answer Time (Objective: <9.5 Seconds)**
- Service Center
 - o Customer Repair Reports
 - Total repair reports received
 - **Repair reports cleared within 24 hours (Objective: 85%)**
 - **Repair commitments met (Objective: 90%)**
 - **Customer repair reports per hundred subscribers (Objective: less than 9.5 troubles per 100)**
 - o Installation of Service
 - Number of install requests received
 - **Installations completed within 5 days of scheduled date (Objective: 90%)**
 - **Installation Commitments Met (Objective: 90%)**

Subsequent to a multi-year and multimillion dollar program to modernize The Virgin Islands Telephone Corporation's network, the Company has improved service quality month over month for the variables identified above. The Modernization Plan detailed below, has translated into fewer trouble tickets and quicker resolution of service and customer care issues.

The Modernization Plan

The cornerstone of the improvement of The Virgin Islands Telephone Corporation's quality of service is its modernization project. The project addressed the need for new services and improved the quality of voice, video and high speed data offerings in most areas of the US Virgin Islands. The Company has made concerted efforts to notify customers of the changes and has advised them that their service interface to the new plant must be upgraded.

The Virgin Islands Telephone Corporation's modernization project was the ultimate remediation plan and largely resolved issues associated with the legacy plant that adversely impacted service quality. This type of network was essential to enabling the launch of advanced services that allow the Company to offer high internet speeds comparable to the mainland, telephone service this is not being maintained on obsolete equipment, and the ability to launch over 193 Standard Definition, 53 High Definition and 50 digital audio channels in the last three years. Further, customers have access to High Definition Digital Video Recorders and are now able to access internet speeds up to 150 Mbps in their homes and up to 1 Gbps at business locations.

The conversion of the entire network was a challenge for both the organization and customers because it was a major change for employees and end-users. It is important to note that, despite various challenges during the conversion process, The Virgin Islands Telephone Corporation has increased significantly the number of performance standards it met in 2016 as the company continued to convert customers to the new network. For standards that are not met, The Virgin Islands Telephone Corporation is required to submit a remediation plan, and the company continues to work cooperatively with the VI Public Services Commission to address any concerns about its quality of service.

Throughout this project, the Company has listened to its customers' feedback and has constantly made adjustments to its processes. All complaints are taken seriously and issues are resolved in a timely manner.

Consumer Protection Rules Compliance

- The Virgin Islands Telephone Corporation participates fully in the Virgin Islands Public Service Commission's telecommunications billing dispute resolution process by which consumers may enlist the PSC to review and resolve billing disputes, a process explained in the General Regulations section of the Company's local services tariff (see Local Tariff, Section 2 - General Regulations, Page 11) and on the PSC website (<http://www.psc.gov.vi/telecom.html>) .
- The Company provides appropriate credits to consumers for significant interruptions in service in accordance with its tariff provisions (see Local Tariff, Section 2, Page 15).
- No disconnection of service for nonpayment is made until a specified period time after the customer is provided with a delinquency notice (see Local Tariff, Section 2, Page 21).
- In compliance with PSC approved tariff regulations all customer challenges to billed amounts are subject to provisions of the federal Truth in Lending Act as related to the required written recognition of a customer complaint and the time period during which resolution must be achieved (see Local Tariff, Section 2, Pages 23 - 24).
- The Company complies fully with PSC-approved regulations regarding the amount of customer deposits, the documentation of receipt of deposits, the accrual of and payment of interest on deposits, and prompt repayment of deposits upon termination of service (see Local Tariff, Section 2, Pages 60 - 61 regarding collection/interest and Page 68 regarding refunds).
- The Company complies fully with the FCC's rules regarding Customer Proprietary Network Information (CPNI).

Implemented Procedures to Function in Emergency Situations

The Virgin Islands Telephone Corporation has backup power including battery banks and dual generator sets at its Central Offices (COs)/Hubs that provide un-interrupted power in the event of an emergency. To provide un-interrupted backup power to nodes out of reach of the COs/Hubs, AlphaGen field generators are installed at strategic locations to feed several nodes; propane tanks are refilled as needed. Since these generators rely on smaller fuel tanks, a plan is in place to constantly monitor and refill these in the event of an emergency lasting for days.

The Virgin Islands Telephone is able to reroute traffic around damaged facilities (via fiber cable - underground and aerial and/or via microwave), and is capable of managing traffic spikes resulting from emergency situations. The community of interest can be served from the central offices and remote locations.

Voice Services Rate Comparability

Virgin Islands Telephone Corporation certifies that our pricing of fixed voice services is no more than two standard deviations above the applicable national average urban rate for voice service, as published annually by the Wireline Competition Bureau, as required in 47 C.F.R. section 54.313(a) (10). The detailed rates below support the certification:

Flat Rate for residential local service:	\$23.00
State SLC, USF, Mandatory EAS and Zone Charges:	0.00
Total Residential Rate (Urban Rate Floor Comparability)	<u>\$23.00</u>
Federal Subscriber Line Charge	6.50
Total Residential Rate (Benchmark Comparability)	<u>\$29.50</u>
Urban Rate Floor (DA 17-167)	\$22.49
Number of Residential service less Lifeline lines below Urban Rate	0
Comparability Benchmark for 2017 (DA 17-167)	\$49.51

Broadband Services Rate Comparability

Virgin Islands Telephone Corporation certifies that our pricing of broadband services is no more than the relevant reasonable comparability benchmark, as published annually by the Wireline Competition Bureau, as required in [47 C.F.R. section 54.313(a) (12)] or is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support. The detailed rates below support the certification:

VIT Broadband Speeds and Pricing

Down	Up	Rate	Benchmarks
1.00	0.77	15.00	Out of Range
3.00	2.00	35.00	Out of Range
6.00	3.00	49.95	71.78
12.00	3.00	59.95	80.89
18.00	3.00	69.99	86.22
25.00	5.00	79.95	90.77
25.00	8.00	89.99	90.99
50.00	8.00	99.99	100.10
100.00	10.00	149.99	Out of Range